

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.<sup>1</sup>

Chapter 11

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**FOURTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE  
OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM  
NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

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1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, “Fredrikson”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between November 1, 2024 and November 30, 2024 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fredrikson respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

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<sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

### **BACKGROUND**

5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.

6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

7. This is Fredrikson’s fourth application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson received court approval for the following prior fee applications:

<b><u>Fee Application Amount</u></b>	<b><u>Date of Order Approving Fee Application</u></b>	<b><u>Docket No.</u></b>
\$80,535.96	10/21/2024	148
\$20,172.00	11/14/2024	164
\$37,675.00	12/13/2024	182
\$138,382.96		

8. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

**RELIEF REQUESTED**

9. **Post-Petition Fees.** By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between November 1, 2024 and November 30, 2024 in the amount of **\$39,841.00**, and reimbursement of expenses in the amount of **\$2,450.00**, for a total of **\$42,291.00**.

10. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

**(5000) Case Administration: \$252.00**

Services include commencing adversary proceedings against certain borrowers.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Shataia Stallings	1.2	2024	\$210	\$252.00
<b>TOTAL</b>	<b>1.2</b>			<b>\$252.00</b>

Blended Hourly Rate:	\$210.00
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**(5001) Asset Analysis and Recovery: \$31,053.00**

Services include drafting forbearance agreements; drafting and revising complaints against borrowers; communicating with the Chief Restructuring Officer (“CRO”) regarding the draft complaints; preparing settlement letters and proposals; and communicating with counsel for borrowers.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	40.2	2024	\$575	\$23,115.00
Katherine A. Nixon	18.5	2024	\$420	\$7,770.00
Shataia Stallings	0.8	2024	\$220	\$168.00
<b>TOTAL</b>	<b>59.5</b>			<b>\$31,053.00</b>

Blended Hourly Rate:	\$521.90
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**(5002) Asset Disposition: \$756.00**

Services include drafting and finalizing notices of settlement with certain borrowers.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	1.8	2024	\$420	\$756.00
<b>TOTAL</b>	<b>1.8</b>			<b>\$756.00</b>

Blended Hourly Rate:	\$420.00
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**(5010) Employment and Fee Applications: \$1,457.00**

Services include drafting, revising, and finalizing Fredrikson's third fee application; reviewing fee application filed by counsel for the official committee of unsecured creditors (the "Committee"); and assisting in preparing and finalizing the CRO's third staffing report.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.0	2024	\$575	\$575.00
Katherine A. Nixon	1.9	2024	\$420	\$798.00
Shataia Stallings	0.4	2024	\$210	\$84.00
<b>TOTAL</b>	<b>3.3</b>			<b>\$1,457.00</b>

Blended Hourly Rate:	\$441.52
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**(5012) Financing and Cash Collateral: \$975.00**

Services include drafting, revising, and finalizing the Debtors' third motion for authorization to use cash collateral.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.6	2024	\$575	\$345.00
Katherine A. Nixon	1.5	2024	\$420	\$630.00
<b>TOTAL</b>	<b>2.1</b>			<b>\$975.00</b>

Blended Hourly Rate:	\$464.29
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**(5013) Meetings and Communications with Creditors: \$1,882.00**

Services include communicating with various creditors and counsel for the Committee; preparing for and attending a Committee meeting; and reviewing the agenda for the Committee meeting.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	3.2	2024	\$575	\$1,840.00
Katherine A. Nixon	0.1	2024	\$420	\$42.00
<b>TOTAL</b>	<b>3.3</b>			<b>\$1,882.00</b>

Blended Hourly Rate:	\$570.30
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**(5015) Plan and Disclosure Statement: \$2,169.50**

Services include reviewing order extending exclusivity period; analyzing plan terms and preparing a plan term sheet; communicating with the Committee and the CRO regarding plan terms; and drafting plan documents.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	3.7	2024	\$575	\$2,127.50
Katherine A. Nixon	0.1	2024	\$420	\$42.00
<b>TOTAL</b>	<b>3.8</b>			<b>\$2,169.50</b>

Blended Hourly Rate:	\$570.92
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**(5018) Reporting: \$582.50**

Services include emailing the CRO regarding monthly operating reports; confirming certain creditors are on the creditor matrix; assisting the CRO in finalizing monthly operating reports; and emailing counsel for the United States Trustee regarding bank records.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2024	\$575	\$57.50
Katherine A. Nixon	0.8	2024	\$420	\$336.00
Shataia Stallings	0.9	2024	\$210	189.00
<b>TOTAL</b>	<b>1.8</b>			<b>\$582.50</b>

Blended Hourly Rate:	\$323.61
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**(0001) Adversary Proceeding Against Preference 42, LLC: \$168.00**

Services include drafting a stipulation to extend the time to answer or otherwise respond to the complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.4	2024	\$420	\$168.00
<b>TOTAL</b>	<b>0.4</b>			<b>\$168.00</b>

Blended Hourly Rate:	\$420.00
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**(0004) Adversary Proceeding Against Boulevard Square II, LLC et al.: \$84.00**

Services include drafting a stipulation to extend the time to answer or otherwise respond to the complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.2	2024	\$420	\$84.00
<b>TOTAL</b>	<b>0.2</b>			<b>\$84.00</b>

Blended Hourly Rate:	\$420.00
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**(0006) Adversary Proceeding Against SAD Downtown, LLC: \$336.00**

Services include drafting a stipulation to extend the time to answer or otherwise respond to the complaint; and serving additional parties and preparing certificates of service.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.3	2024	\$420	\$126.00
Shataia Stallings	1.0	2024	\$210	\$210.00
<b>TOTAL</b>	<b>1.3</b>			<b>\$336.00</b>

Blended Hourly Rate:	\$258.46
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**(0007) Adversary Proceeding Against Greenfield Commons, LLC et al.: \$126.00**

Services include drafting a stipulation to extend the time to answer or otherwise respond to the complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.3	2024	\$420	\$126.00
<b>TOTAL</b>	<b>0.3</b>			<b>\$126.00</b>

Blended Hourly Rate:	\$420.00
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**TOTAL POST-PETITION FEES: \$39,841.00**

11. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter No. 5000 on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Filing Fees for Adversary Proceedings	\$2,450.00
<b>TOTAL</b>	<b>\$2,450.00</b>

**TOTAL EXPENSES: \$2,450.00**

12. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

13. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services

rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

**WHEREFORE**, Fredrikson respectfully requests that the Court enter an order:

- A. Allowing Fredrikson's fees incurred between November 1, 2024 and November 30, 2024 in the amount of **\$39,841.00**, and expenses in the amount of **\$2,450.00**, totaling **\$42,291.00**;
- B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;
- C. Granting administrative expense priority to Fredrikson's allowed fees and expenses; and
- D. Granting such other and further relief as may be just and proper.

Dated: December 18, 2024

/e/ Steven R. Kinsella

Michael S. Raum (#05676)  
**FREDRIKSON & BYRON, P.A.**  
51 Broadway, Suite 400  
Fargo, ND 58102-4991  
701.237.8200  
mraum@fredlaw.com

Steven R. Kinsella (#09514)  
Katherine A. Nixon (*pro hac vice* MN #0402772)  
**FREDRIKSON & BYRON, P.A.**  
60 South 6<sup>th</sup> Street, Suite 1500  
Minneapolis, MN 55402-4400  
612.492.7000  
skinsella@fredlaw.com  
knixon@fredlaw.com

**ATTORNEYS FOR DEBTORS**



**AFFIDAVIT**

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare under penalty of perjury that the foregoing Fourth Application of Fredrikson & Byron, P.A. for Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from November 1, 2024 Through November 30, 2024 is true and correct according to the best of my knowledge, information, and belief.

Dated: December 18, 2024

/s/ Steven R. Kinsella  
Steven R. Kinsella

**EXHIBIT A**

## CourtAlert® Case Management

**From:** ecf@ndb.uscourts.gov  
**Sent:** 7/25/2024 12:56:27 PM  
**To:** nate\_olson@ndb.uscourts.gov  
**Subject:** Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

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**CAUTION: EXTERNAL E-MAIL**

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**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

**U.S. Bankruptcy Court**

**District of North Dakota**

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

**Case Name:** EPIC Companies Midwest, LLC

**Case Number:** [24-30281](#)

**Document Number:** [49](#)

**Docket Text:**

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

**24-30281 Notice will be electronically mailed to:**

Douglas Christensen on behalf of Creditor Beth Holmes  
dougc@grandforkslaw.com,  
sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward  
mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward  
jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke  
phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

John M Krings, Jr. on behalf of Creditor Cornerstone Bank  
john@kaler-doeling.com, janae@kaler-doeling.com

Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC  
knixon@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Richard P. Olson on behalf of Creditor Essential Living Inc  
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Richard P. Olson on behalf of Creditor Bruce & Diane Walker  
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Robert B. Raschke  
USTPRegion12.SX.ECF@usdoj.gov

Michael S Raum on behalf of Debtor EPIC Companies Midwest, LLC  
mraum@fredlaw.com, mraum@fredlaw.com;dtaylor@fredlaw.com

Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC  
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz  
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz  
klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke  
sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc.  
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch  
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

**24-30281 Notice will not be electronically mailed to:**

**EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

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Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

**IT IS ORDERED** that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

**IT IS FURTHER ORDERED** that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

**IT IS FURTHER ORDERED** that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

**IT IS FURTHER ORDERED** that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE  
UNITED STATES BANKRUPTCY COURT



**EXHIBIT C**

# Fredrikson

Invoice: 1895306  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5000

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Case Administration**

Total for Current Legal Fees:	\$ 252.00
Total For Current Costs and Other Charges:	\$ 2,450.00
<b>Total For Current Invoice:</b>	<b>\$ 2,702.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

**\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\***

**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1895306  
Invoice Date: December 5, 2024  
Page:

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888535	1,418.00		1,418.00
<b>Total Prior Balance:</b>				<b>\$ 1,418.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.

# Fredrikson

Invoice: 1895306  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5000

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	S. Stallings	Attention to adversary complaints and e-file.	1.20	252.00
<b>Current Legal Fees:</b>			<b>1.20</b>	<b>\$ 252.00</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Shataia Stallings	210.00	1.20	252.00
<b>Total</b>		<b>1.20</b>	<b>\$ 252.00</b>

## Costs and Other Charges

	<u>Amount</u>
11/04/24 COURTS/USBC-ND-P - Adversary Complaint Fees	1,750.00
11/22/24 COURTS/USBC-ND-P - Adversary Complaint Fees	700.00
<b>Current Costs and Other Charges:</b>	<b>\$ 2,450.00</b>

## Invoice Totals

Total for Current Legal Fees:	\$ 252.00
Total For Current Costs and Other Charges:	\$ 2,450.00
<b>Total For Current Invoice:</b>	<b>\$ 2,702.00</b>

# Fredrikson

Invoice: 1895307  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5001

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Asset Analysis and Recovery**

Total for Current Legal Fees: \$ 31,053.00

**Total For Current Invoice: \$ 31,053.00**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

**\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\***

**Please remit this page with your payment. Thank you. We appreciate your business.**

**Fredrikson**

Invoice: 1895307  
Invoice Date: December 5, 2024  
Page:

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888536	30,218.50		30,218.50
<b>Total Prior Balance:</b>				<b>\$ 30,218.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1895307  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5001

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	S. Kinsella	Draft forbearance agreement (1.1); revise complaints and communications with CRO regarding the same (.8).	1.90	1,092.50
11/01/24	K. Nixon	Revise and finalize complaint(s) for recovery of assets.	6.90	2,898.00
11/03/24	K. Nixon	Review filed copies of complaint(s) and send to CRO.	0.30	126.00
11/03/24	S. Kinsella	Prepare settlement letters.	0.90	517.50
11/04/24	K. Nixon	Meeting with CRO regarding asset analysis (0.7); draft default letter to borrower (0.7).	1.40	588.00
11/04/24	S. Kinsella	Meeting with CRO regarding negotiations and complaints (.8); phone call with counsel for project (.3); prepare and send settlement proposal letter (1.0); prepare additional settlement proposal letter (.6).	2.70	1,552.50
11/05/24	S. Kinsella	Finalize and send settlement proposal (.2); phone call with CRO regarding settlement proposal and negotiations (1.3).	1.50	862.50
11/06/24	K. Nixon	Attention to service of summonses and complaints.	0.50	210.00
11/06/24	S. Kinsella	Phone call with counsel for project and follow up emails (.3); prepare additional settlement proposals (1.0).	1.30	747.50
11/07/24	K. Nixon	Attention to certificates of service for summonses and complaints.	0.50	210.00
11/07/24	S. Kinsella	Meeting and communications with CRO regarding settlement proposals and complaints (1.1); prepare settlement proposals (1.4).	2.50	1,437.50
11/08/24	S. Kinsella	Meeting with CRO regarding settlement proposals and prepare settlement proposals.	2.10	1,207.50



Invoice:  
Invoice Date:  
Page:

1895307  
December 5, 2024  
2

11/08/24	K. Nixon	Email S. Kinsella re: notice of settlement.	0.10	42.00
11/11/24	S. Kinsella	Meeting with CRO regarding cash collateral motion and status of settlement negotiations (.5); prepare multiple settlement proposals and send to project borrowers (2.3); communications with CRO regarding settlement proposals (.6); prepare list of additional complaints and begin preparing analysis (.6).	4.00	2,300.00
11/11/24	S. Stallings	Attention to civil case filings in Cass County against Epic Management.	0.80	168.00
11/11/24	K. Nixon	Meeting with CRO regarding asset analysis.	0.50	210.00
11/12/24	S. Kinsella	Prepare settlement letter and send (.4); multiple phone calls with CRO regarding settlement proposals (1.3); meeting with counsel for project borrower (.5).	2.20	1,265.00
11/13/24	S. Kinsella	Communications with counsel for project borrowers.	0.50	287.50
11/15/24	S. Kinsella	Multiple meetings with project borrowers and counsel (1.5); follow-up communications with requested information (.5).	2.00	1,150.00
11/18/24	S. Kinsella	Meeting with CRO regarding status of project borrower negotiations (.6); multiple communications with counsel for various project borrowers (.7).	1.30	747.50
11/18/24	K. Nixon	Meeting with CRO regarding asset analysis.	0.80	336.00
11/19/24	S. Kinsella	Prepare multiple settlement letters for project borrowers (3.0); email communications with other borrowers (.6); phone call with CRO regarding the same (.3).	3.90	2,242.50
11/20/24	S. Kinsella	Meeting with CRO regarding settlement proposals (.8); prepare and send settlement proposals (.5).	1.30	747.50
11/20/24	K. Nixon	Draft complaint(s) against borrowers.	1.40	588.00
11/21/24	S. Kinsella	Meeting and follow up communications with CRO regarding settlement proposals (1.5); prepare and send settlement counteroffers to opposing counsel (.7); prepare and send information requested by opposing counsel (.3).	2.50	1,437.50
11/21/24	K. Nixon	Draft complaint(s) against borrowers.	3.40	1,428.00
11/22/24	K. Nixon	Finalize complaint(s) against borrowers and coordinate service of the same.	1.80	756.00





Invoice: 1895307  
 Invoice Date: December 5, 2024  
 Page: 3

11/22/24	S. Kinsella	Prepare and send settlement proposals (1.1); meeting with CRO regarding status of settlement proposals (.8); phone call with creditor counsel (.2); review and finalize complaints (.4); communications with counsels for project borrowers (.6).	3.10	1,782.50
11/24/24	S. Kinsella	Prepare settlement agreement.	0.70	402.50
11/25/24	S. Kinsella	Revise settlement agreement (.3); meeting with CRO regarding status of settlement proposals (.5); phone calls with CRO regarding settlement proposals (.4); prepare and send letters and emails to project borrower counsels regarding settlement proposals (1.3).	2.50	1,437.50
11/25/24	K. Nixon	Meeting with CRO regarding asset analysis.	0.70	294.00
11/26/24	K. Nixon	Strategize re: additional complaint(s) against borrowers.	0.20	84.00
11/26/24	S. Kinsella	Phone call with CRO regarding status of settlement negotiations (.7); provide instruction regarding additional adversary complaints (.4); review and revise settlement notice (.2); communications with settlement counterparty regarding payment (.1); communications with project borrower regarding demand letter (.3); prepare settlement proposals (.3).	2.00	1,150.00
11/27/24	S. Kinsella	Review and revise settlement notices (.1); review and revise answer date stipulations (.1); draft settlement agreements (.9).	1.10	632.50
11/28/24	S. Kinsella	Review filed settlement notices and communications with project borrowers regarding the same.	0.10	57.50
11/29/24	S. Kinsella	Attention to settlement notices and communications regarding the same.	0.10	57.50
<b>Current Legal Fees:</b>			<b>59.50</b>	<b>\$ 31,053.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	40.20	23,115.00
Katherine Nixon	420.00	18.50	7,770.00
Shataia Stallings	210.00	0.80	168.00
<b>Total</b>		<b>59.50</b>	<b>\$ 31,053.00</b>



Invoice: 1895307  
Invoice Date: December 5, 2024  
Page: 4

**Invoice Totals**

Total for Current Legal Fees:	\$ 31,053.00
<b>Total For Current Invoice:</b>	<b>\$ 31,053.00</b>

# Fredrikson

Invoice: 1895308  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5002

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Asset Disposition**

Total for Current Legal Fees:	\$ 756.00
<b>Total For Current Invoice:</b>	<b>\$ 756.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

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Invoice: 1895308  
Invoice Date: December 5, 2024  
Page:

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888537	115.00		115.00
<b>Total Prior Balance:</b>				<b>\$ 115.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1895308  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5002

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/26/24	K. Nixon	Draft and finalize notice of settlement with HIE Depot, LLC and email copies to CRO and HIE reps.	0.90	378.00
11/27/24	K. Nixon	Draft and finalize notices of settlement with MBG Land and 8th & Main and email copies to CRO and counterparty reps.	0.90	378.00
Current Legal Fees:			1.80	\$ 756.00

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	420.00	1.80	756.00
Total		1.80	\$ 756.00

### Invoice Totals

Total for Current Legal Fees:	\$ 756.00
<b>Total For Current Invoice:</b>	<b>\$ 756.00</b>

# Fredrikson

Invoice: 1895309  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5010

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Employment and Fee Applications**

Total for Current Legal Fees: \$ 1,457.00

**Total For Current Invoice: \$ 1,457.00**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

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Invoice: 1895309  
Invoice Date: December 5, 2024  
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**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888541	1,505.50		1,505.50
<b>Total Prior Balance:</b>				<b>\$ 1,505.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1895309  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5010

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/05/24	K. Nixon	Draft third staffing report for CRO.	0.20	84.00
11/08/24	K. Nixon	Draft Fredrikson's third fee application.	0.70	294.00
11/08/24	S. Kinsella	Review Committee fee application.	0.20	115.00
11/11/24	S. Kinsella	Review and revise third fee application.	0.50	287.50
11/11/24	K. Nixon	Draft Fredrikson's third fee application.	0.80	336.00
11/14/24	S. Kinsella	Review orders granting Fredrikson fee application and approving Lighthouse staffing report.	0.10	57.50
11/15/24	S. Kinsella	Review and finalize fee application.	0.10	57.50
11/15/24	S. Stallings	Finalize and e-file third fee application for Fredrikson.	0.40	84.00
11/19/24	K. Nixon	Finalize CRO's third staffing report.	0.10	42.00
11/20/24	K. Nixon	Email CRO re: third staffing report.	0.10	42.00
11/20/24	S. Kinsella	Review staffing report.	0.10	57.50
<b>Current Legal Fees:</b>			<b>3.30</b>	<b>\$ 1,457.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	1.00	575.00
Katherine Nixon	420.00	1.90	798.00
Shataia Stallings	210.00	0.40	84.00
<b>Total</b>		<b>3.30</b>	<b>\$ 1,457.00</b>





Invoice: 1895309  
Invoice Date: December 5, 2024  
Page: 2

**Invoice Totals**

Total for Current Legal Fees:	\$ 1,457.00
<b>Total For Current Invoice:</b>	<b>\$ 1,457.00</b>

# Fredrikson

Invoice: 1895310  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5012

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Financing and Cash Collateral**

Total for Current Legal Fees:	\$ 975.00
<b>Total For Current Invoice:</b>	<b>\$ 975.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[Redacted Wire Instructions]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [Redacted]

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Invoice: 1895310  
Invoice Date: December 5, 2024  
Page:

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888542	617.00		617.00
<b>Total Prior Balance:</b>				<b>\$ 617.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1895310  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5012

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/08/24	K. Nixon	Draft third motion for authorization to use cash.	1.00	420.00
11/08/24	S. Kinsella	Review and revise cash collateral motion.	0.30	172.50
11/11/24	S. Kinsella	Finalize cash collateral motion.	0.30	172.50
11/11/24	K. Nixon	Finalize third motion for authorization to use cash.	0.50	210.00
<b>Current Legal Fees:</b>			<b>2.10</b>	<b>\$ 975.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.60	345.00
Katherine Nixon	420.00	1.50	630.00
<b>Total</b>		<b>2.10</b>	<b>\$ 975.00</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 975.00
<b>Total For Current Invoice:</b>	<b>\$ 975.00</b>

# Fredrikson

Invoice: 1895311  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5013

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Meetings and Communications with Creditors**

Total for Current Legal Fees:	\$ 1,882.00
<b>Total For Current Invoice:</b>	<b>\$ 1,882.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[Redacted Wire Instructions]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [Redacted]

**\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\***

**Please remit this page with your payment. Thank you. We appreciate your business.**

**Fredrikson**

Invoice: 1895311  
Invoice Date: December 5, 2024  
Page:

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888543	57.50		57.50
<b>Total Prior Balance:</b>				<b>\$ 57.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1895311  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5013

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/06/24	S. Kinsella	Communications with creditor.	0.20	115.00
11/11/24	S. Kinsella	Meeting with committee counsel regarding settlement negotiations.	1.10	632.50
11/13/24	S. Kinsella	Communications with committee counsel.	0.10	57.50
11/25/24	S. Kinsella	Communications with creditor.	0.10	57.50
11/26/24	S. Kinsella	Review agenda for Committee meeting.	0.10	57.50
11/27/24	K. Nixon	Retrieve promissory note per request of Friends of the Wave.	0.10	42.00
11/27/24	S. Kinsella	Prepare for and participate in meeting with Committee (1.4); phone call with counsel for creditor (.2).	1.60	920.00
<b>Current Legal Fees:</b>			<b>3.30</b>	<b>\$ 1,882.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	3.20	1,840.00
Katherine Nixon	420.00	0.10	42.00
<b>Total</b>		<b>3.30</b>	<b>\$ 1,882.00</b>

### Invoice Totals

Total for Current Legal Fees: \$ 1,882.00

**Total For Current Invoice: \$ 1,882.00**

# Fredrikson

Invoice: 1895312  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5015

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Plan and Disclosure Statement**

Total for Current Legal Fees:	\$ 2,169.50
<b>Total For Current Invoice:</b>	<b>\$ 2,169.50</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

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**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[Redacted Wire Instructions]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [Redacted]

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**Please remit this page with your payment. Thank you. We appreciate your business.**





Invoice: 1895312  
Invoice Date: December 5, 2024  
Page:

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888544	1,149.50		1,149.50
<b>Total Prior Balance:</b>				<b>\$ 1,149.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1895312  
 Invoice Date: December 5, 2024  
 Client Number: 097807  
 Matter Number: 097807.5015

EPIC Companies Midwest, LLC  
 Attn: Patrick Finn  
 900 Long Lake Rd, Suite 180  
 Lighthouse Management Group, Inc.  
 New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/06/24	K. Nixon	Review order extending exclusivity period and email CRO re: the same.	0.10	42.00
11/08/24	S. Kinsella	Analyze plan terms and prepare plan term sheet.	2.50	1,437.50
11/13/24	S. Kinsella	Analyze term sheet.	0.10	57.50
11/19/24	S. Kinsella	Communications with committee regarding plan terms and CRO meeting.	0.10	57.50
11/25/24	S. Kinsella	Begin drafting plan documents.	1.00	575.00
<b>Current Legal Fees:</b>			<b>3.80</b>	<b>\$ 2,169.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	3.70	2,127.50
Katherine Nixon	420.00	0.10	42.00
<b>Total</b>		<b>3.80</b>	<b>\$ 2,169.50</b>

### Invoice Totals

Total for Current Legal Fees: \$ 2,169.50

**Total For Current Invoice: \$ 2,169.50**

# Fredrikson

Invoice: 1895313  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Reporting**

Total for Current Legal Fees:	\$ 582.50
<b>Total For Current Invoice:</b>	<b>\$ 582.50</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

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Minneapolis, MN 55480-1484

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Tax ID: [REDACTED]

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**Fredrikson**

Invoice: 1895313  
Invoice Date: December 5, 2024  
Page:

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876154	7,565.50	(3,001.50)	4,564.00
11/04/24	1888539	703.00		703.00
<b>Total Prior Balance:</b>				<b>\$ 5,267.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of December 5, 2024. If payment has been sent close to this date, please verify payment status.

# Fredrikson

Invoice: 1895313  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.5018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/04/24	K. Nixon	Email CRO copies of September MORs.	0.10	42.00
11/06/24	K. Nixon	Confirm misc. creditors are on creditor matrix.	0.20	84.00
11/19/24	K. Nixon	Attention to CRO inquiry re: October MOR.	0.20	84.00
11/19/24	S. Kinsella	Review MOR.	0.10	57.50
11/20/24	K. Nixon	Review October MORs.	0.30	126.00
11/20/24	S. Stallings	Attention to finalizing exhibits and finalizing October 2024 monthly operating report and e-file (.8); email to UST regarding bank records (.1).	0.90	189.00
<b>Current Legal Fees:</b>			<b>1.80</b>	<b>\$ 582.50</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.10	57.50
Katherine Nixon	420.00	0.80	336.00
Shataia Stallings	210.00	0.90	189.00
<b>Total</b>		<b>1.80</b>	<b>\$ 582.50</b>

## Invoice Totals

Total for Current Legal Fees: \$ 582.50

**Total For Current Invoice: \$ 582.50**

# Fredrikson

Invoice: 1895302  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0003

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

Regarding: Adversary action against Preference 42, LLC

Total for Current Legal Fees: \$ 168.00

**Total For Current Invoice: \$ 168.00**

**Payment is due within 30 days from receipt of invoice**

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\***

**Please remit this page with your payment. Thank you. We appreciate your business.**

# Fredrikson

Invoice: 1895302  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0003

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/27/24	K. Nixon	Draft stipulation to extend time to answer complaint.	0.40	168.00
<b>Current Legal Fees:</b>			<b>0.40</b>	<b>\$ 168.00</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	420.00	0.40	168.00
<b>Total</b>		<b>0.40</b>	<b>\$ 168.00</b>

## Invoice Totals

Total for Current Legal Fees: \$ 168.00

**Total For Current Invoice: \$ 168.00**

# Fredrikson

Invoice: 1895303  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0004

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Adversary against Boulevard Square**

Total for Current Legal Fees:	\$ 84.00
<b>Total For Current Invoice:</b>	<b>\$ 84.00</b>

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

**\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\***

**Please remit this page with your payment. Thank you. We appreciate your business.**



# Fredrikson

Invoice: 1895303  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0004

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/27/24	K. Nixon	Draft stipulation to extend time to answer complaint.	0.20	84.00
<b>Current Legal Fees:</b>			<b>0.20</b>	<b>\$ 84.00</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	420.00	0.20	84.00
<b>Total</b>		<b>0.20</b>	<b>\$ 84.00</b>

## Invoice Totals

Total for Current Legal Fees: \$ 84.00

**Total For Current Invoice: \$ 84.00**

# Fredrikson

Invoice: 1895304  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

Regarding: Adversary against SAD Downtown, LLC d/b/a The Firm

Total for Current Legal Fees: \$ 336.00

**Total For Current Invoice: \$ 336.00**

**Payment is due within 30 days from receipt of invoice**

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\***

**Please remit this page with your payment. Thank you. We appreciate your business.**

# Fredrikson

Invoice: 1895304  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/06/24	S. Stallings	Attention to additional notice parties regarding summonses and complaints and arrange for service (.4); attention to preparing certificates of service for adversary proceedings (.5).	1.00	210.00
11/27/24	K. Nixon	Draft stipulation to extend time to answer complaint.	0.30	126.00
<b>Current Legal Fees:</b>			<b>1.30</b>	<b>\$ 336.00</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	420.00	0.30	126.00
Shataia Stallings	210.00	1.00	210.00
<b>Total</b>		<b>1.30</b>	<b>\$ 336.00</b>

## Invoice Totals

Total for Current Legal Fees: \$ 336.00

**Total For Current Invoice: \$ 336.00**

# Fredrikson

Invoice: 1895305  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through November 30, 2024

**Regarding: Adversary against Greenfield Commons**

Total for Current Legal Fees: \$ 126.00

**Total For Current Invoice: \$ 126.00**

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\***

**Please remit this page with your payment. Thank you. We appreciate your business.**

# Fredrikson

Invoice: 1895305  
Invoice Date: December 5, 2024  
Client Number: 097807  
Matter Number: 097807.0007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/27/24	K. Nixon	Draft stipulation to extend time to answer complaint.	0.30	126.00
<b>Current Legal Fees:</b>			<b>0.30</b>	<b>\$ 126.00</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	420.00	0.30	126.00
<b>Total</b>		<b>0.30</b>	<b>\$ 126.00</b>

## Invoice Totals

Total for Current Legal Fees: \$ 126.00

**Total For Current Invoice: \$ 126.00**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**NOTICE OF FOURTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR  
ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE  
DEBTORS FROM NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

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TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its fourth application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Wednesday, January 8, 2025, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may deemed waived.

Dated: December 18, 2024

*/e/ Steven R. Kinsella*

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Michael S. Raum (#05676)

**FREDRIKSON & BYRON, P.A.**

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

**FREDRIKSON & BYRON, P.A.**

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knixon@fredlaw.com

**ATTORNEYS FOR DEBTORS**